



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



February 28, 2013

REPLY TO THE ATTENTION OF:

Mr. Jorge Y. Garcia
Estate of Chemetco, Incorporated
3754 Chemetco Lane
Hartford, Illinois 62048

RE: North Polishing Pond and Sump Work Plan for the Chemetco Site, Hartford, Illinois

Dear Mr. Garcia:

On January 22, 2013, U.S. Environmental Protection Agency received a copy of the draft North Polishing Pond and Sump Work Plan. In consultation with Illinois Environmental Protection Agency, we have the following comments. Please respond and revise the work plan accordingly.

General

1. Please provide a copy of the bankruptcy court approval of this sale, the purchase contract, and buyer's certificate of recycling, and buyer's compliance documentation.
2. After removing the material of value from the sump, the Estate should close the sump to prevent the future accumulation of water or other materials in the sump. Describe the Estate's proposal for such work as part of this work plan.
3. After removing the material of value from the pond, the Estate should take the opportunity to prevent the future infiltration of storm water into the bottom of the pond. Describe the Estate's proposal for such work as part of this work plan.
4. Please propose applicable or relevant and appropriate requirements (ARARs) for this work plan.

Purpose

5. It's unclear from the figure which feature the Estate plans to do work on with this work plan. The feature labeled North Polishing Pond on Figure 1 appears to be the West Cooling Lagoon. The Sump is indiscernible.

Characterization of Materials

6. The characterization of materials is insufficient. Besides scrubber sludge, what else makes up the fines? Provide all analytical data available.
7. Please describe how the fines material addressed by this work plan is a recyclable metal bearing material.

Material Removal and Handling

8. In this Section, should the plan specify:
- a) How "drier fines" will be removed from the north polishing pond (NPP) and transported as well as the conditions where this would be appropriate;
 - b) How and where material from the Sump will be combined with material in the NPP as well as how and where it will be allowed to air dry;
 - c) How long the remaining fines material will be allowed to air dry by evaporation and where that will occur;
 - d) How "removed" or "contained" water will be collected.
9. "Future management" must be more specifically defined as disposal, as specified in the Handling, Packaging and Shipping Section. How long would the water remain awaiting disposal?
10. It is not appropriate to allow decontamination water from the scrap metal recycling to be placed in the NPP and allowed to evaporate.
11. Please provide a figure that indicates the work area, staging area, loading area, and decontamination area addressed by this work plan.

Handling, Packaging, and Shipping

12. Do not refer to procedures described in other work plans. Describe all procedures needed for this work in this work plan.
13. In this Section, should the plan specify:
- a) How long the material will be allowed to "air dry"?
 - b) What criteria will be used to determine when the dried material is to be "deemed acceptable for shipping"?

Schedule

14. When will the work be complete?

Pollution Prevention

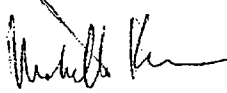
15. This section mentions for the first time storing fines in the Dome Building. Please describe/explain.
16. Describe the engineering controls proposed to control fugitive dust.

Health & Safety

17. Attach the material and safety data sheet for scrubber sludge, please.

Of course, do not hesitate to contact me with questions about any of these comments; we can certainly set up a meeting to discuss at your convenience.

Sincerely,



Michelle Kerr
Remedial Project Manager

cc: Chris Cahnovsky, IEPA
Erin Rednour, IEPA
James Morgan, IAGO
Donald M. Samson, Trustee
Elliot G. Stegin, Paradigm
Dan C. Nester, Bryan Cave
Penni Livingston, Livingston Law

"Farm House"